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INFORMATION SOCIETY PROJECT

April 18, 2014

### VIA ELECTRONIC FILING

Honorable Analisa Torres  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

**Re: ACLU, *et ano* v. National Security Agency, *et al.*,  
No. 13 Civ. 09198 (AT) (MHD)**

Dear Judge Torres:

We are counsel for plaintiffs in the above-referenced Freedom of Information Act (“FOIA”) lawsuit, and submit this letter jointly on behalf of all parties.

As directed during our conference with the Court on April 16, 2014, the parties have discussed a timeline for the defendant agencies to search for and produce documents responsive to plaintiffs’ FOIA requests and/or specify the basis for any withholding of responsive documents. The parties request that the Court adopt the following schedule by so-ordering this letter:

- By no later than **May 7, 2014**, the parties will submit a joint stipulation setting forth the scope of plaintiffs’ request for documents under FOIA with respect to each defendant, or submit their respective positions for determination by the Court.
- By no later than **May 21, 2014**, the parties will submit a joint stipulation setting the deadline by which each defendant must complete its search for responsive documents, or submit their respective positions for determination by the Court.
- By no later than **June 20, 2014**, the parties will submit a joint stipulation setting the deadline by which each defendant must complete its processing of responsive documents and provide those documents to plaintiffs and/or specify the basis on which it believes any responsive document is properly exempt from disclosure under FOIA, in whole or in part, or submit their respective positions for determination by the Court.

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The parties understand that these deadlines may not be extended except upon a further application to the Court by the party or parties seeking additional time. We thank the Court for its consideration of this matter.

Respectfully submitted,



David A. Schulz

cc: David Jones  
Jean-David Barnea  
Assistant United States Attorneys

Alexander Abdo, Esq.  
Patrick Toomey, Esq.

SO ORDERED:

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U.S.D.J.

Date: \_\_\_\_\_